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July 23, 2013

Ms. Sherrel Henry
USEPA - Region II
290 Broadway, 19th Floor
New York, NY 10007-1866

Re: **Draft Final OU2 Remedial Investigation Report
In the Matter of CERCLA Docket No. 02-2010-2017
Shieldalloy Metallurgical Corporation Superfund Site - Newfield, NJ**

Dear Ms. Henry:

TRC has prepared the attached Draft Final Operable Unit 2 (OU2) Remedial Investigation Report (RIR), for the above-referenced site, in fulfillment of the project's Administrative Order on Consent dated April 28, 2010 (AOC), Appendix A Scope of Work (SOW) Section III Task IV.

We provide the United States Environmental Protection Administration (EPA) one hard copy and one digital copy (discs), per the EPA's request. We provide the New Jersey Department of Environmental Protection (NJDEP) one hard copy, and one digital copy.

This Draft Final OU2 RIR summarizes the work and incorporates the following key OU2 reports (as appendices):

- OU2 Draft Final Baseline Ecological Risk Assessment (BERA); and
- OU2 Revised Draft Baseline Human Health Risk Assessment (BHHRA).

We have also included, attached to this letter, a response to EPA's comments on the Draft OU2 RI.

R2-0004580

This Draft OU2 RIR has accomplished the following objectives:

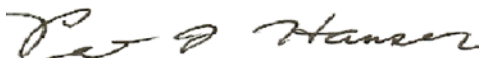
- Presented RI activities and results;
- Characterized OU2;
- Presented the Baseline Risk Assessment; and
- Provided information that can support the FS.

Should your team wish to meet to discuss the Draft OU2 RIR, or meet to discuss the project, we would be pleased to do so.

Please contact me should you have any concerns or wish to discuss the project.

Regards,

TRC

A handwritten signature in black ink, appearing to read "Patrick J. Hansen".

Patrick J. Hansen, PE
Project Coordinator

Attachment

Cc: Ms. Donna Gaffigan, NJDEP (1 hard copy with discs)
Mr. David White, SMC (1 hard copy with discs)
Mr. Carl Reitenbach, Chartis (1 hard copy with discs)

**Response to EPA's June 14, 2013 Comments on
Revised Draft OU2 Remedial Investigation Report
Shieldalloy Metallurgic Corporation (SMC) Superfund Site
Newfield, New Jersey**

EPA Cover Letter Comment

“EPA believes that additional information is still necessary and that Chapter 3 of the Site Characterization Summary Report (SCSR) provides a detailed discussion...As such, the SCSR should be merged into the RI report.”

TRC Response: TRC has included the detailed discussions from the SCSR into the revised RI Section 4, and has moved/modified the exceedance of PRG discussion to Section 5, as requested. Further, the detailed data figures and tables have been merged into the RI. [Note: some of the page/section references have shifted as a result of these adjustments. In the responses, below TRC attempts to reference the appropriate sections.]

EPA General Comment

EPA “notes that Section 3.5 of the RI, ARAR's & TBCs states that there are no location-specific ARARs currently applicable to the project. We disagree with this statement. As noted in our memo of June 8, 2011, the following location-specific ARARs are potentially applicable to OU2.

- EPA's Statement of Procedures on Floodplain Management and Wetlands Protection
- Executive order 11988, Floodplain Management
- Executive Order 11990, Protection of Wetlands
- EPA's 1985 Statement of Policy on Floodplains/Wetlands Assessments for CERCLA Actions
- The Endangered Species Act
- The National Historic Preservations Act"

TRC Response: TRC has added Section 1.5.1, Location Specific ARARs/TBCs to include appropriate discussions of these elements.

EPA Specific Comments

1. Section 3.7.1 Potential Federal Contaminant-Specific ARARs/TBCs, Page 23

It is stated that the EPA Regional Screening Levels will be applicable to the soils at the facility. In the next section it states that the promulgated State Remediation Standards, NJAC 7:26D, will be consider for screening purposes. Please note that all promulgated New Jersey State stands should be considered as ARARs for the Site.

TRC Response: The ARAR discussion, now is Section 1.5, has been adjusted.

2. Section 3.7.2, Potential State Contaminant-Specific ARARs/TBCs, Pages 23-24

- a. Please note that the NJDEP remediation Standards, NJAC 7:26D, were revised on May 7, 2012. The RI must reference and use this version of the Remediation Standard for comparison to the soil data, since some of the individual standards may have changed since 2008.

TRC Response: The latest New Jersey standards are included in the Draft Final OU2 RI.

- b. Impact to ground water soil screening/remediation levels should be discussed in the RIR...Therefore, impact to ground water pathway must be evaluated. Site specific impact to ground water remediation standards numbers should be developed or the NJDEP's Default Impact to Ground Water Soil Screening Levels for Contaminant numbers should be used....

TRC Response: TRC has added the IGW discussion and analysis in Section 2.4.6

- c. The NJDEP's Soil Cleanup Criteria for Chromium are listed in the enclosed link which was updated in April 2010, and include a limit of 20 ppm hexavalent chromium nonresidential scenarios. However, as discussed in Commissioner Jackson's memorandum dated February 8, 2007, enclosed, the limit of 20 ppm hexavalent chromium is also applied to residential scenarios as well. NJDEP's Soils Cleanup Criteria for Chromium must be addressed in the RIR.

TRC Response: TRC includes the 20 ppm for chromium in the Draft Final OU2 RI.

- d. NJDEP is currently re-evaluating the Soil Remediation Standards for vanadium to determine if site-specific SRSR is appropriate for SMC. Relevant information will be provided when it becomes available.

TRC Response: The Draft Final OU2 RI is completed with information available at the time of writing.

3. Section 4.1.2 Facility Soil, Page 26

This section should be revised to include a discussion identifying all contaminants detected above the NJ Remediation Standard and the Soil Cleanup Criteria for Chromium.

TRC Response: Section 4.2 discusses exceedances of all screening criteria.

4. Appendix A, Final Site Characterization Summary Report, February 2013

- a) The Operable Unit 2 Site Characterization Summary report (OU2 SCSR) should consider the NJDEP's Ecological Screening Criteria. Vanadium detected in Baseline Ecological Risk Assessment (BERA) soil samples at concentrations up to 286 ppm are above the NJDEP soil Ecological Screening Criterion (ESC) of 2 ppm for wildlife and terrestrial plants. All contaminants detected above Promulgated standards must be addressed in the Feasibility Study.

TRC Response: NJDEP's ESC's are used as screening criteria, as discussed in Section 3.3. Contaminants above promulgated standards are noted in the OU2 RI.

b) Section 3.1.2, Overview of Facility Soil Nature and Extent of Contamination, Pages 32-33

On page 32, it states that "The OU1 Work has determined that no soil-source of groundwater contamination exists in Facility Soils (OU2), so OU2 work need not further evaluate the soil to ground water pathway". Insufficient rationale is presented in the SCSR to discount this pathway, impact to ground water soil screening/remediation levels should be provided for comparison to the soil data.

TRC Response: TRC includes the IGW analysis in the Draft Final OU2 RI, in Section 4.2.6.

c) Section 3.1.6.1.2 Southwest Corner of Facility, Page 40

On page 40, it is stated "No standards are available for total chromium in soils". Please note that NJDEP's ESC for chromium in soil is 1 mg/kg (flora) and 0.4 mg/kg (flora and fauna).

TRC Response: TRC is unable to locate the exact phrase referenced by this comment. Appropriate screening criteria are used for screening.

EPAs Comments on the BERA, Appendix B, February 2013

5. Appendix B, Draft Final Baseline Ecological Risk Assessment (BERA)

The following comments are primarily editorial but should be corrected.

a) Typos

Bottom of page 5-7—According to Figure 5-3, “Lead:203 mg/kg” should be “Lead:303 mg/kg”.

Pages 3-1—Results of the sediment toxicity testing appear to be discussed in Sections 5.0 and/or 4.1.2.3 of the BERA, not in Section 5.0.

Page 3-3—In the 3rd sentence in the bottom paragraph, should “aquatic invertebrate: sediment BAFs” be “vegetation (or plan): sediment BAFs”?

Page 5-8—In the second sentence of the third paragraph, should “the removal of” be inserted after “will result in”?

b) Page 1-1: The list of referenced guidance documents should include NJDEP’s August 2011 Ecological Evaluation Technical Guidance.

c) Page 5-8, Section 5.2.1.4, Extent of COPEC’s above Proposed PRGs—the first paragraph states “Proposed PRGs are not exceeded in Burnt Mill Pond.” The second paragraph state “The chromium and nickel proposed PRGs were exceeded at 14 samples of the 39 Hudson Branch (and Burnt Mill Pond) sediment samples. These sentences appear contradictory and require editing or clarification.

TRC Response: These adjustments have been made, as appropriate.